

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

TALECRIS BIOTHERAPEUTICS, INC. and	)	
BAYER HEALTHCARE LLC,	)	
	)	
Plaintiffs,	)	C. A. No. 05-349-GMS
	)	
v.	)	JURY TRIAL DEMANDED
	)	
BAXTER INTERNATIONAL INC. and	)	
BAXTER HEALTHCARE CORPORATION,	)	
	)	
Defendants	)	
	)	
_____	)	
	)	
BAXTER HEALTHCARE CORPORATION,	)	
	)	
Counterclaimant,	)	
	)	
v.	)	
	)	
TALECRIS BIOTHERAPEUTICS, INC. and	)	
BAYER HEALTHCARE LLC,	)	
	)	
Counterdefendants.	)	

**NOTICE OF DEPOSITIONS OF BAYER CORPORATION, GAUTAM MITRA,  
RALPH ROUSELL, GRACE TSAY AND PAUL K. NG**

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, Defendant Baxter International Inc. and Defendant/Counterclaimant Baxter Healthcare Corporation (collectively "Baxter"), by and through their attorneys of record, will take the depositions of the following at the dates, times and location specified:

Bayer Corporation	9:00 a.m., September 15, 2006	Powers Garrison & Hughes, 600 Warner Center, 332 5th Avenue Pittsburgh, PA 15222, (412) 263-2088
Gautam Mitra	9:00 a.m., September 18, 2006	Whittman Reporting, 15200 Shady Grove Road, Suite 350 Rockville, MD 20850, (301) 279-7599

Ralph Rousell	9:00 a.m., September 20, 2006	Klein Bury/U.S. Legal Support, 888 S.E. Third Avenue, Suite 201, Ft. Lauderdale, FL 33316 (954) 463-2933
Grace Tsay	9:00 a.m., September 22, 2006	Townsend and Townsend and Crew, LLP, Two Embarcadero Center, 8th Fl. San Francisco, CA 94111 (415) 576-0200
Paul K. Ng	9:00 a.m., September 25, 2006	Townsend and Townsend and Crew, LLP, Two Embarcadero Center, 8th Fl. San Francisco, CA 94111 (415) 576-0200

The deposition will be before a notary public, or other authorized person to administer oaths, will be recorded stenographically and/or by video tape, will include the use of interactive real time transcription (e.g., Live Notes), and will continue from day to day until completed.

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Dated: August 23, 2006

747359

By: /s/ Philip A. Rovner

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**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF DELAWARE**  
**CERTIFICATE OF SERVICE**

I, Philip A. Rovner, hereby certify that on August 23, 2006, the within document was filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following; that the document was served on the following counsel as indicated; and that the document is available for viewing and downloading from CM/ECF.

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